

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI**

JOHN BARNHARDT, et al.,	)	
	)	
Plaintiffs,	)	
	)	
and	)	
	)	
UNITED STATES OF AMERICA,	)	Civil Action No. 4:65-cv-01300-HTW-LRA
	)	1300(E)
Plaintiff-Intervenor,	)	
	)	
v.	)	
	)	
MERIDIAN MUNICIPAL SEPARATE	)	
SCHOOL DISTRICT, et al.,	)	
	)	
Defendants.	)	
	)	

**DECLARATION OF NATASHA C. MERLE**

Pursuant to 28 U.S.C. § 1746, I, Natasha C. Merle, state as follows:

1. I am an attorney duly licensed to practice law in the State of New York and the State of Texas, and I am counsel for Plaintiffs John Barnhardt, *et al.*, in the above-captioned matter. I have personal and firsthand knowledge of the facts set forth herein and, if called as a witness, I could and would testify competently thereto.
2. Defendant Meridian Municipal Separate School District (the “District”) filed a Motion for Declaration of Unitary Status in this case on March 29, 2018.
3. Plaintiffs served Requests for Information on June 19, 2018.
4. The District responded on June 22, 2018, objecting to the relevance of seven of the Plaintiffs’ Requests for Information.
5. On July 5, 2018, Plaintiffs responded to the District’s objections.
6. On July 25, 2018, Plaintiffs propounded supplemental information requests on the District.

7. On July 31, 2018, the District replied to Plaintiffs' requests, maintaining all its objections.
8. On August 28, 2018, Plaintiffs sent a meet and confer letter to the District.
9. On September 7, 2018, the District responded to Plaintiffs' meet and confer letter with written objections to five of Plaintiffs' outstanding requests for information.
10. The District filed these objections with the Court on September 13.
11. On September 21, 2018, Plaintiffs' filed a response to the District's objections.
12. The Court held a status conference on September 24, 2018, at which Plaintiffs raised the issue of their outstanding requests for information. The parties informed the Court that they had reached an impasse regarding the requests for information after conferring in good faith. The Court ordered the Plaintiffs to file a motion to compel and set a briefing schedule.
13. Attached as Exhibit 1 to Plaintiffs' Motion to Compel Production of Information is a true and correct copy of the November 7, 1969 Desegregation Order.
14. Attached as Exhibit 2 to Plaintiffs' Motion to Compel Production of Information is a true and correct copy of Plaintiffs' June 19, 2018, Requests for Information.
15. Attached as Exhibit 3 to Plaintiffs' Motion to Compel Production of Information is a true and correct copy of Plaintiffs' July 25, 2018, Supplemental Requests for Information.
16. Attached as Exhibit 4 to Plaintiffs' Motion to Compel Production of Information is a true and correct copy of Plaintiffs' August 28, 2018 Meet and Confer Letter.
17. Attached as Exhibit 5 to Plaintiffs' Motion to Compel Production of Information is a true and correct copy of the Good Faith Certificate executed by both parties.

Dated: October 1, 2018

/s/ Natasha Merle  
Natasha Merle  
NAACP Legal Defense and  
Educational Fund, Inc.  
40 Rector Street, 5th Floor  
New York, New York 10006  
Tel: (212) 965-2200  
Fax: (212) 226-7592  
nmerle@naacpldf.org

**CERTIFICATE OF SERVICE**

I hereby certify that on the 1st day of October 2018, I electronically filed the foregoing with the Clerk of the Court using the ECF system, which sent notification of such filing to all counsel record.

/s/ Natasha Merle  
Natasha Merle  
NAACP Legal Defense and  
Educational Fund, Inc.  
40 Rector Street, 5th Floor  
New York, New York 10006  
Tel: (212) 965-2200  
Fax: (212) 226-7592  
nmerle@naacpldf.org